January 11, 2019

National Labor Relations Board
Office of the Executive Secretary
1015 Half Street SE
Washington, DC 20570

To Whom It May Concern:

Please accept this letter as Counsel for the Charged Party/Respondent's formal request for an extension of time to file Exceptions and a Brief in Support thereof to the Administrative Law Judge Lauren Esposito's Decision & Order dated December 20, 2018 in the above-referenced matter. This is Respondent's first request for an extension of time pertaining to the filing of Exceptions and Briefs.

Pursuant to the accompanying Order Transferring Proceeding to the NLRB Exceptions and Briefs in Support thereof are currently due on January 17, 2019. I respectfully request that the due date be extended to March 18, 2019 in light that my current familial and client responsibilities as well as case load make it virtually impossible to adequately draft and file Exceptions and a Brief in Support thereof by the January 17, 2019 due date as explained in further detail herein.

Shortly prior to Judge Esposito's Decision and Order I welcomed my first child into the world in December 2018. While this joyous life-changing event is rewarding beyond belief my newfound responsibilities as a first time father precluded me from handling much of the motion practice and other client related matters that were scheduled during December 2018 and the beginning of January 2019, thereby requiring me to adjourn a number of matters. Of particular note, the holidays and period out of the office to tend to my new born precluded me from reviewing the aforesaid decision and order until January 8, 2019, being the day after I officially returned to the office.

As of date, the previous motions for summary judgment and multiple order to show causes that I had adjourned from their December dates are presently scheduled to be argued on January 16th and January 22nd, with written opposition for the latter due on January 15th. Further, there are a variety of additional motions that I have briefs due for in late January and February, along with associated arguments dates associated therewith. Further, present client matters along with those that require my oversight and were pushed back from December for the reasons previously set

forth herein only add to making my time to adhere to the instant January 17th filing date impossible. One such client matter that is requiring a substantial amount of time involves a commercial transaction that I am overseeing for a client that entails close to an eight figure acquisition cost of an asset, with contract negotiations pertaining thereto presently underway as of the date of this request along with the time consuming due diligence period estimated to be conducted during most of February.

Further, I am away visiting family in New Hampshire from over the President's Day holiday, specifically from February 15th through the 20th and will be unable to work on any client matters during that time period as I will, in addition to being preoccupied with family will have poor cell reception and absolutely no access to internet during this time. Thus, due to my current workload and family trip to introduce my new son to his relatives I will not be able to adequately complete my client's exceptions and brief until March 18th.

Please note that neither the Charging Party's Counsel, Mr. Richard Maroko, Esq. nor the Ms. Brown-Maynor, Esq. of the General Counsel's Office have answered my written request made to them at 1:05p.m. January 11th for their respective consent and/or position to my application for an extension as of date. Further, I am optimistic that the additional time will permit the parties to take advantage of the ADR program offered by the NLRB and/or effectively use that period to attempt reach a resolution to this an other related matters prior to the need for exceptions and/or briefs being due.

Thank you for your time and consideration,

Robert C. Lorenc

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